

August 7, 2002

Docket Management System  
U.S. Department of Transportation, Room Plaza 401  
400 Seventh Street SW  
Washington, DC 20590-0001

Re: Docket FA-2002-12261; Reduced Vertical Separation  
Minimum in Domestic United States Airspace

American Trans Air (ATA) is the nation's 10th largest passenger carrier based on revenue passenger miles. ATA operates significant scheduled service from Chicago-Midway and Indianapolis to over 40 business and vacation destinations. American Trans Air was one of the first U.S. air carriers to be approved for North Atlantic and European RVSM operations. Our experience with RVSM has been positive. The added RVSM flight levels provide additional options and utility for both flight planning and during flight.

American Trans Air will be operating an RVSM compliant fleet of over 70 aircraft at the proposed time of DRVSM implementation. American Trans Air supports an aggressive domestic implementation schedule to expand RVSM benefits, including:

- ~ 1% fuel burn reduction
- Additional Flight Levels enhancing airspace capacity and reducing delays
- Enhanced controller/pilot flexibility to support re-routes for weather or traffic

American Trans Air supports a full implementation from flight level 290 to 390 beginning December 2004. American Trans Air does not support a phased implementation. We believe a phased implementation will create unnecessary airspace complexity and delay the benefits of RVSM and return on investment.

Sincerely,

William D. Beal  
Vice President of Flight Operations

WDB/mf

Enclosures: 1

cc: Jim Enias, Technical Programs Manager  
Captain David Lindskoog, System Chief Pilot  
M. Fraley, Manager, Flight Operations Administration